



June 9, 2020

Timothy Nennig – Utility Superintendent
Grafton Water & Wastewater Utility
860 Badger Circle
Grafton, WI 53024

Subject: Village of Grafton (WPDES Permit No. WI-0020184)
Adaptive Management Plan – Conditional Approval

Dear Mr. Nennig:

The Wisconsin Department of Natural Resources (WDNR) has received the final draft of the Adaptive Management (AM) Plan prepared by Symbiont Science, Engineering and Construction, Inc. on behalf of the Village of Grafton. The most recent plan was submitted on December 31, 2019 and considered comments provided on the initial draft from November 2019. The Department has reviewed the AM plan and has no additional comments at this time.

Based on the WDNR's review, the AM Plan is in general conformance with the WDNR Adaptive Management Guidance and requirements contained in s. NR 217.18, Wis. Adm. Code. The plan indicates that the Village will utilize AM to comply with the effluent limitations for total phosphorus for their discharge from the Village of Grafton Wastewater Treatment Plant, Outfall 001, to the Milwaukee River. Actions outlined in the AM plan mostly involve nonpoint phosphorus reductions within the greater Milwaukee River Basin TMDL River Reach MI-17. For continued AM eligibility, phosphorus reductions undertaken by the Village and its partners are expected to offset the WWTP's proportional phosphorus loading to the Milwaukee River, 322 lbs/yr, within the first permit term.

The WDNR conditionally approves the AM Plan as a basis for phosphorus compliance during the next WPDES permit term. The WDNR has assigned the AM plan a tracking number of WQT-2020-0012 and will be referenced as such in the draft WPDES permit. The draft permit will contain an interim limit for phosphorus and reporting requirements consistent with s. NR 217.18, Wis. Adm. Code. The final AM plan will be included as part of the public notice package for permit reissuance, and final approval is subject to public comment and EPA review.

The WDNR appreciates your interest in watershed-based phosphorus compliance. If you have any questions or comments, please contact me at (414) 399-3039 or nicholas.lent@wisconsin.gov.

Thank you,

Nick Lent
Wastewater Engineer
Wisconsin Department of Natural Resources

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